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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

| | | |
|---|---|---------------------------------|
| WILHELMINA E. HOWARD, |) | Case No. 2:14-cv-1211-GMN-GWF |
| |) | |
| Plaintiff, |) | |
| |) | |
| vs. |) | UNOPPOSED MOTION FOR |
| |) | EXTENSION OF TIME (FIRST |
| CAROLYN W. COLVIN, |) | REQUEST) |
| Acting Commissioner of Social Security, |) | |
| |) | |
| Defendant. |) | |

Defendant Carolyn W. Colvin, Acting Commissioner of Social Security ("Defendant") respectfully requests that the Court extend the time for Defendant to file her Objections to the Report and Recommendation of the Magistrate Judge, due on **March 30, 2016**, by **28 days**, through and including **April 28, 2016**.

An extension of time is needed because counsel for Defendant is responsible for drafting various pleadings before the district courts within the Ninth Circuit, negotiating or litigating attorney fee matters pursuant to the Equal Access to Justice Act, and conducting discovery and drafting substantive documents in personnel-related litigation pending before the Equal Employment Opportunity Commission.

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2 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this
3 motion, on March 28, 2016.

4 Respectfully submitted this 28th day of March 2016.

5 DANIEL G. BOGDEN
6 United States Attorney

7 /s/ Asim H. Modi
8 ASIM H. MODI
9 Special Assistant United States Attorney

10 OF COUNSEL:

11 DEBORAH LEE STACHEL
12 Acting Regional Chief Counsel, Region IX

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14 IT IS SO ORDERED:

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16 UNITED STATES DISTRICT JUDGE

17 DATED: March 28, 2016
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CERTIFICATE OF SERVICE

I, **Asim H. Modi**, certify that the following individual was served with a copy of the **UNOPPOSED MOTION FOR EXTENSION OF TIME (FIRST REQUEST)** on the date and via the method of service identified below:

CM/ECF:

Gerald M. Welt, Esq.
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Dated this 28th day of March 2016.

//s// Asim H. Modi

ASIM H. MODI

Special Assistant United States Attorney